



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: JULY 15, 2005

July 15, 2005

Ms. Barbara Wu, Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
355 S. Grand Avenue, 15th Floor
Los Angeles, CA 90071

**Draft Mitigated Negative Declaration for the Proposed Central Region Elementary
School No. 16**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration. The SCAQMD requests that for all future school projects, the lead agency provide all the air quality technical support information and documents to facilitate review of the air quality impacts of the proposed projects.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC050614-02
Control Number

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Air Quality Analysis

1. According to the site characteristics described on page 16 of the Draft MND, the proposed site is currently occupied by a number of existing structures. Although these structures would need to be demolished and the waste materials would need to be hauled away for disposal, there is no analysis of demolition air quality impacts. The SCAQMD requests that the lead agency quantify demolition emissions, providing any assumptions used, emission factors, equations, etc. in the Final MND.
2. Although Table 3C-1 shows daily construction emissions, the table only shows combustion emissions from construction equipment. For example, the table does not include fugitive dust (PM10) emissions from grading or other site preparation activities. The lead agency rationalizes this omission by stating that compliance with SCAQMD Rule 403 - Fugitive Dust would ensure that fugitive dust emissions are less than significant. Although SCAQMD Rule 403 helps reduce PM10 emissions, PM10 emissions are still generated and, therefore, should be quantified and the impact disclosed in the CEQA document. The SCAQMD requests that the lead agency quantify PM10 emissions from site preparation, including assumptions made, area disturbed per day, emission factors, equations, etc., and the results included in Table 3C-1.
3. On page 19 of the Draft MND, it is stated that parking for the proposed project is proposed to be provided by an underground parking garage. The lead agency, however, does not appear to quantify emissions from cut-and-fill operations necessary to construct the underground parking garage, including the number of construction equipment and hours of operation, emissions from trucks transporting soil off-site, emissions from stockpiles, emissions from storage pile emptying and truck filling, etc. Fugitive PM10 emissions, as well as combustion emissions from construction equipment and haul trucks should be quantified and added to Table 3C-1.

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CEQA Public Disclosure of Potential Toxic Sources

4. State of California AB2588 California Code 17213 and Public Resources Code 21151.8(a)(4) require school districts to identify potential toxic sites within one-quarter mile of proposed schools. The sources, listed in Section 3G.d. Hazards and Hazardous Materials in pages 47-48 of the Draft MND that were used by the lead agency to identify these potential toxic sources, do not include the SCAQMD data base of SCAQMD's stationary source-permitted facilities within one-quarter-mile of the proposed schools. The maps and lists of SCAQMD permitted facilities should be requested from the SCAQMD and included in the Final MND for review by the public.

Information identifying facilities with SCAQMD permits or pending applications with the SCAQMD, that are located within a radius of one-quarter and one-half mile of the proposed school site, and in order to obtain a list identifying each facility shown on the map, please contact SCAQMD staff at (909) 396-3739.

Potential Export and Disposal of Contaminated Soils

5. In Section 3G.b. Hazards/Hazardous Materials on page 45, the Draft MND describes soil excavation that has the potential to be classified as a hazardous waste. The lead agency is reminded that, if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final MND.

In addition, based on the potential for contact with asbestos during the demolition phase of the proposed project also described in paragraph three, the lead agency should cite the influence of compliance with SCAQMD Rule 1403 – Asbestos Removal.